

EXHIBIT A



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December 21, 2022

Via Email Only: Bjones@mckayfirm.com

Brandon Jones, Esq.
The McKay Firm, P.A.

Re: Heather Douglas, individually and as mother and guardian for A.D. a minor v. Brittain Resorts & Hotels, LLC and Ocean Front Investors, LLC, d/b/a Caribbean Resorts & Villas and Hucks Pool Company, Inc., Caribbean Oceanfront Tower Homeowners' Association, Inc. and Ally Management, Inc. Case No: 4:21-cv-01773-RBH

Dear Brandon-

Attached, please find Plaintiff's Second Set of Requests for Production to Defendants', Brittain Resorts & Hotels, LLC and Ocean Front Investors, LLC, d/b/a Caribbean Resort & Villas, which I hereby serve upon you pertaining to the above referenced civil matter.

Thank you for your attention to this matter. If you should have any questions or concerns, please do not hesitate to contact me.

Sincerely

Kenneth E. Berger

KEB/sls
Enclosure

Cc: Mark S. Barrow, Esq. (Via Email Only: Msb@swblaw.com)
J. Ryan Oats, Esq. (Via Email Only: Jro@swblaw.com)
Erin Powers, Esq. (Via Email Only: erin@TL4J.com)
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

**Heather Douglas, Individually and as
Mother and Guardian for A.D., a Minor,**

Plaintiff,

v.

**Brittain Resorts & Hotels, LLC; Ocean
Front Investors, LLC d/b/a Caribbean
Resort & Villas; Hucks Pool Company,
Inc.; Caribbean Oceanfront Tower
Homeowners' Association, Inc.; Ally
Management, Inc.**

Defendants.

Case No.: 4:21-cv-1773-RBH

**PLAINTIFF'S SECOND SET OF
REQUESTS FOR PRODUCTION TO
DEFENDANTS' BRITTAİN RESORTS &
HOTELS, LLC; OCEAN FRONT
INVESTORS, LLC, D/B/A CARIBBEAN
RESORT & VILLAS**

**TO: BRANDON P. JONES, ESQUIRE, ATTORNEY FOR DEFENDANTS' BRITTAİN
RESORTS & HOTELS, LLC; OCEAN FRONT INVESTORS, LLC, D/B/A
CARIBBEAN RESORT & VILLAS.:**

The Plaintiff hereby serve the following Requests for Production, pursuant to Rule 34 of the Federal Rules of Civil Procedure, to be answered by Defendants Brittain Resorts & Hotels, LLC and Ocean Front Investors, LLC d/b/a Caribbean Resort & Villas, in writing, and under oath within thirty (30) days from the date of service hereof. These requests shall be deemed continuing so as to require supplemental production.

**PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION TO
DEFENDANTS' BRITTAİN RESORTS & HOTELS, LLC and OCEAN FRONT
INVESTORS, LLC, D/B/A CARIBBEAN RESORT & VILLAS**

1. Please produce a sworn statement of Defendants' net worth.
2. Please produce Defendants' tax returns from 2018, 2019, 2020, 2021, and once finalized, 2022.
3. Please produce Defendants' most recent yearly balance sheet.
4. Please produce Defendants' most recent yearly profit and loss statement.

5. Please produce a current financial statement for Defendants setting forth a complete listing of Defendants' assets and liabilities from January 1, 2018 through present.
6. Please provide Defendants' entire pool chemical reading logs (exp. previously produced Brittain/Caribbean 16-23) from January 1, 2019 through present.
7. Please provide all stored or maintained pool chemical readings from automatic controllers from January 1, 2019 through present.
8. Please provide all "Actual vs. Scheduled Hours" and "Time Detail" Reports (exp. previously produced Brittain/Caribbean 24-31) from January 1, 2019 through present.
9. Please provide complete personnel files for Juan Rivera, Robert Wright, and Tony Robinette.
10. Please provide all documents related to pool operator certifications, including payment records/receipts for training courses.

LAW OFFICE OF KENNETH E. BERGER, LLC

s/Kenneth E. Berger
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AND

TRIAL LAWYERS FOR JUSTICE

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Attorneys for the Plaintiff

Columbia, South Carolina
December 21, 2022

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

**Heather Douglas, individually and as
mother and guardian for A.D., a minor,**

Plaintiff,

v.

**Brittain Resorts & Hotels, LLC; Ocean
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Homeowners' Association, Inc.; Ally
Management, Inc.**

Defendants.

Case No.: 4:21-cv-01773-RBH

CERTIFICATE OF SERVICE

This is to certify that the foregoing, **Plaintiff's Second Set of Requests for Production to Defendants' Brittain Resorts & Hotels, LLC and Ocean Front Investors, LLC, d/b/a Caribbean Resort & Villas**, have been served upon the parties at the addresses listed below via email only on this 21st day of December 2022:

Brandon Jones, Esq.
The McKay Firm, P.A.
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Mark S. Barrow, Esq.
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Shannon Spalter

Shannon Spalter, Paralegal to Kenneth E. Berger

Columbia, South Carolina